

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

United States of America,

Plaintiff

v.

Dominique Owens,

Defendant

Case No.: 2:21-cr-00168-JAD-EJY-4

**Order Denying Motion to Reduce Sentence**

[ECF No. 266]

Dominique Owens pled guilty to three counts of bank burglary and one count of interstate transportation of stolen property, and I sentenced him to 51 months in custody followed by 3 years of supervised release.<sup>1</sup> Owens now moves for a reduction in his sentence under 18 U.S.C. § 3582(c)(2), which was recently amended to authorize courts to reduce a defendant's term of imprisonment if "extraordinary and compelling reasons" warrant a reduction, known as Amendment 821.<sup>2</sup> Because I find that Owens's argument for relief is not covered by Amendment 821, I deny his motion.

The Sentencing Commission submitted criminal-history amendments to Congress in May 2023, they took effect in November 2023, and courts have been applying them retroactively since February 2024.<sup>3</sup> Owens argues that he is entitled to a sentence reduction under this change in the law because the 2-level sentence enhancement he received for using "a special skill, in a manner that significantly facilitated the commission or concealment of the offense" does not

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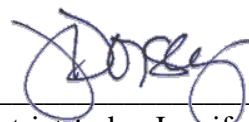
<sup>1</sup> ECF No. 241.

<sup>2</sup> 18 U.S.C. § 3582(c)(1)(A)(i).

<sup>3</sup> Sent'g Guidelines for U.S. Courts, 88 Fed. Reg. 60534, 60534 (Sept. 1, 2023).

1 apply to him and should be removed.<sup>4</sup> But as his appointed counsel acknowledges in a  
2 subsequent filing, this argument for relief is not covered by Amendment 821.<sup>5</sup> And, according to  
3 his appointed counsel, Owens is also ineligible for a sentence reduction under Parts A and B of  
4 Amendment 821 because he did not receive any “status” points and was not a zero-point  
5 offender at the time of sentencing.<sup>6</sup> So his motion necessarily fails, and I deny it.

6 Because Dominique Owens’s argument for a sentence reduction is not covered by  
7 Amendment 821, IT IS ORDERED that his motion for a sentence reduction under Amendment  
8 821 [ECF No. 266] is **DENIED**.



U.S. District Judge Jennifer A. Dorsey  
April 10, 2025

22 <sup>4</sup> ECF No. 266 at 2; ECF No. 266-1; U.S.S.G. § 3B1.3 (cleaned up).

23 <sup>5</sup> ECF No. 269 at 2 n.1.

<sup>6</sup> *Id.* at 1.